



hearing and determining the Civil Action.

3. Pursuant to 28 U.S.C. § 1334 (c)(1), this Honorable Court should abstain from hearing and determining the Civil Action, and the Court should remand the Civil Action pursuant to 28 U.S.C. § 1452(b).

4. Movants submit the accompanying memorandum in support of this motion, which is adopted and incorporated herein.

5. Movants, do not consent to the entry of a final order or judgment by the Bankruptcy Court.

WHEREFORE, Movants respectfully request that this Honorable Court:

- (a) Abstain from hearing the Civil Action,
- (b) Remand the Civil Action to the State Court,
- (c) Remand the Non-Swain Claims, and/or
- (d) Grant such other and further relief as is just.

July 10, 2025

Respectfully submitted:

/s/ Patrick D. Gardiner

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 10<sup>th</sup> day of July, 2025, a copy of the foregoing was sent via CM-ECF on the following:

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